



UNITED STATES OF AMERICA
SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ 8982

UNITED STATES OF AMERICA)
)
Plaintiff,)
v.)
Olga Lydia CORONA-Sanchez)
)
Defendant.)

MAGISTRATE CASE NO.: _____

COMPLAINT FOR VIOLATION OF:

Title 8, U.S.C. § 1324(a)(2)(B)(ii)
Bringing in Illegal Aliens for Financial
Gain

The undersigned complainant, being duly sworn, states:

On or about December 12, 2007, within the Southern District of California, defendant Olga Lydia CORONA-Sanchez, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, Eleazar CHAVERRO-Vargas and Luciano PEREZ-Garcia, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said aliens for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, 1324(a)(2)(B)(ii).

And the complainant states that this complaint is based on the attached Statement of Facts, which is incorporated herein by reference.

Figueroa

IZABEL FIGUEROA, CBP
Criminal Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 14TH DAY
OF DECEMBER 2007.

Peter C. Lewis

PETER C. LEWIS
U. S. Magistrate Judge

1 UNITED STATES OF AMERICA

2 v.
Olga Lydia CORONA-Sanchez

3 STATEMENT OF FACTS

4 The complainant states that this complaint is based upon the reports of the apprehending
5 officers and the investigation conducted by United States Customs & Border Protection Enforcement
6 Officer Izabel Figueroa.

7 On December 12, 2007, at approximately 2:40 p.m., Olga Lydia CORONA-Sanchez arrived
8 at the Calexico, CA, east Port of Entry, as the driver of a 1991 Toyota Camry, and was accompanied
9 by Eleazar CHAVERRO-Vargas and Luciano PEREZ-Garcia.

10 During the primary inspection, CORONA gave a negative Customs declaration to Officer
11 S. Baca. Officer Baca asked CORONA where she was going. CORONA stated she was going to
12 the WalMart Store in Calexico. Officer Baca conducted a records check of the Border Crossing Card
13 CORONA presented which disclosed CORONA to be an imposter. Officer Baca referred
14 CORONA, CHAVERRO, PEREZ and the vehicle to the secondary inspection area.

15 In the vehicle secondary area, records check disclosed CORONA is a native and citizen of
16 Mexico with numerous apprehension using false immigration documents to enter the United States
17 and driver of vehicles containing passengers of false documents.

18 CORONA was placed under arrest. CORONA was advised of her rights per Miranda.
19 CORONA stated she understood her rights and agreed to answer questions without the presence of
20 an attorney. CORONA stated she made arrangements with a man named, "Armando". CORONA
21 admitted "Armando" has been giving her false documents for her to use. CORONA stated she has
22 used these false documents in the last eight attempts to enter the United States.. CORONA stated
23 she was to pay "Armando" \$2,500.00 for the false documents. CORONA stated she made an
24 agreement with "Armando" to pay half of the smuggling fee, if she drove the vehicle into the United
25 States.

26 Material Witness Eleazar CHAVERRO-Vargas stated he is a citizen and national of Mexico
27 with no legal documents to enter, reside or pass through the United States. CHAVERRO stated an
28 unknown man picked him up in Mexico and took him to an unknown house where he waited until

1 he was told it was time to leave. CHAVERRO stated he was going to pay the smugglers
2 approximately \$3,000.00 to be smuggled into the United States.

3 Material Witness Luciano PEREZ-Garcia stated he is a citizen and national of Mexico with
4 no legal documents to enter, reside or pass through the United States. PEREZ stated he was going
5 to pay \$3,000.00 to be smuggled into the United States. PEREZ stated CORONA picked him up at
6 an unknown location in Mexico and told him to get in the vehicle. PEREZ stated CORONA
7 provided the false immigration documents for him to enter the United States.

8 Material Witnesses:

9	NAME	COUNTRY OF BIRTH
10	Eleazar CHAVERRO-Vargas	Mexico
11	Luciano PEREZ-Garcia	Mexico

12 Further, the complainant states that she believes said aliens are citizens of a country other
13 than the United States; that said aliens have admitted that they are deportable; that their testimony
14 is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are
15 material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant
16 to Title 18, United States Code, Section 3144.